UNITED STATES DISTRICT COURT	
SOUTHERN DISTRICT OF NEW YORK	
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UNITED STATES OF AMERICA,

18 CR 316 (PAC)

-against-

NOTICE OF MOTION

MATTHEW BRADY, et al.,

Defendants.

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PLEASE TAKE NOTICE that upon the accompanying memorandum and supporting exhibits, defendant Matthew Brady hereby move this Court, before Hon. Paul A. Crotty, for an order granting compassionate release per 18 U.S.C. § 3582 or further relief as this Court may deem just and proper.

Dated: New York, NY April 8, 2020

Respectfully submitted,

/S/

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Attorney for Matthew Brady

TO: Hon. Paul A. Crotty
Daniel Patrick Moynihan
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AUSA Daniel C. Richenthal AUSA Tara M. LaMorte AUSA Robert B. Sobelman Southern District of New York One Saint Andrew's Plaza New York, NY 10007

4/13/2020

While the exhaustion requirements can be waived, Brady's case does not merit a departure. His conditions do not seem that serious and there is nothing about the current conditions at Lexington that justify such a departure. In these circumstances a departure from the statutory scheme is not merited. 18 U.S.C. § 3582(c)(1)(a).

SO ORDERED

Paul A Ceth